



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

OCT 28 2009

J. Sharon Heywood, Forest Supervisor
Shasta-Trinity National Forest
3644 Avtech Parkway
Redding, CA 96002
Attn: Gemmill Thin Project

Subject: Draft Supplemental Environmental Impact Statement for the Gemmill Thin Project, Trinity County, California (CEQ# 20100360)

Dear Ms. Heywood:

The Environmental Protection Agency (EPA) has reviewed the Draft Supplemental Environmental Impact Statement (DSEIS) for the above project. Our review and comments are pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

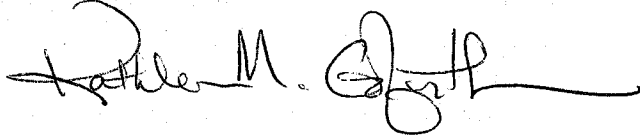
Developed during the administrative appeals process, the preferred alternative (Alternative 4) will thin vegetation on approximately 1,618 acres in the Shasta-Trinity National Forest within the Chancelulla Late-Successional Reserve (LSR). EPA understands that the project is intended to improve the conditions in the LSR and reduce fuels in the Wildland Urban Interface (WUI). We acknowledge the importance of the project's goals of improving forest health, reducing fuel loading, and protecting communities from wildfire risk.

We have rated the DSEIS as Environmental Concerns—Insufficient Information (EC-2) (see enclosed "Summary of Rating Definitions"). EPA previously reviewed the Draft Environmental Impact Statement (DEIS) on November 10, 2008 and the Final Environmental Impact Statement (FEIS) on June 1, 2009. In our FEIS letter, we had remaining concerns regarding the criteria for determining the largest and healthiest trees that would not be removed as part of the thinning project. The DSEIS states that "in all treatment units, the largest and healthiest trees would be retained, and no trees more than 150 years old will be removed" (pg. 14). It continues to be unclear what the threshold would be to determine which trees would be classified as "largest and healthiest" as well as how a tree will be determined to be over 150 years old. Who will make this determination? Under Alternatives 1 and 4: "Few trees harvested would be greater than 18 inches DBH, however, trees over this size may be removed when they are in direct competition with a larger tree" (pg. 29). What is the definition of "direct competition" and how is it measured? Do the thinning treatments target specific species of trees? The Purpose and Need of the

Gemmill project includes a return to desired conditions for the project area, described as a natural landscape that is resilient to fire events with fuel loading smaller than 5 tons per acre (pg. 4-5). EPA believes that more information should be provided as to what trees will be harvested and how the Forest Service will know when they are successful in achieving the stated Purpose and Need. We recommend that the FEIS and Record of Decision identify specific guidelines such as leaving a minimum number of trees per acre, leaving trees greater than a specific DBH, or committing to a specific canopy height for the different treatment units.

We appreciate the opportunity to review this DSEIS and are available to discuss our comments. When the FEIS is released for public review, please send one hard copy and one CD to the address above (mail code: CED-2). If you have any questions, please contact Stephanie Skophammer, the lead reviewer for this project, at (415) 972-3098 or skophammer.stephanie@epa.gov, or contact me at (415) 972-3521.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen M. Goforth", with a long horizontal flourish extending to the right.

Kathleen M. Goforth, Manager
Environmental Review Office

Enclosures: Summary of EPA Rating Definitions

cc: Bobbie DiMonte Miller, Shasta-Trinity National Forest

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

"Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.